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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 REZA RAE POURIAN,

15 Plaintiff,

16 v.

17 UNITED STATES OF AMERICA,

18 Defendant.

Case No. 3:18-cv-04536-RS

STIPULATION AND ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE AND ALLOW UNITED
STATES TO FILE AN AMENDED
ANSWER

19
20 Plaintiff Reza Rae Pourian and Defendant the United States of America, through their
21 respective undersigned counsel of record, stipulate as follows and respectfully request an order
22 pursuant to this stipulation for a continuance of the case management conference currently set for
23 June 20, 2019, and to allow the United States to file an amended answer.

24 1. Plaintiff Reza Rae Pourian filed his Complaint in this matter on July 26, 2018,
25 seeking a refund of \$134,529, plus interest, based on an alleged overpayment of federal income tax
26 for tax year 2011. (Docket No. 1)

27 2. The United States timely answered on October 2, 2018. (Docket No. 13).

1 3. The Court conducted an initial case management conference on November 15, 2018.
2 Subsequently, the Court issued its Case Management Scheduling Order which sets a Further Case
3 Management Conference for June 20, 2019, at 10:00 a.m. (Docket No. 25).

4 4. Since the Court's Order, the parties have been engaged in discovery and the United
5 States has found it must amend its Answer in order to assert additional defenses.

6 5. Accordingly, the parties stipulate, pursuant to Rule 15(a)(2) of the Federal Rules of
7 Civil Procedure, that the United States may file an Amended Answer in the above-captioned case
8 on or before June 7, 2019.

9 6. Furthermore, due to a scheduling conflict with government counsel's calendar and to
10 allow the parties additional time to pursue resolution discussions, the parties seek to continue the
11 Further Case Management Conference currently set for June 20, 2019, for sixty days.

12 7. This is the parties' first stipulation for a continuance of the second case management
13 conference.

14 Dated this 29th day of May, 2019

15 RICHARD E. ZUCKERMAN
16 Principal Deputy Assistant Attorney General

17 /s/ Amy Matchison
18 AMY MATCHISON (CA SBN 217022)
19 Trial Attorney, Tax Division
20 United States Department of Justice

21 *Attorneys for UNITED STATES OF AMERICA*

22 Dated this 29th day of May, 2019

23 SIDEMAN & BANCROFT LLP

24 By: /s/ Jay R. Weill
25 Jay R. Weill
26 Travis W. Thompson

27 *Attorneys for REZA RAE POURIAN*

1 IT IS SO ORDERED.

2 Dated this 30 day of May, 2019

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5 RICHARD SEEBORG
6 UNITED STATES DISTRICT JUDGE
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1 ECF CERTIFICATION

2 Pursuant to Local Rule 5-1(i)(3), I hereby attest that I obtained concurrence in the filing
3 of this document from the signatory indicated by the conformed signature (/s/) of Jay R. Weill.

4 /s/ Amy Matchison
5 AMY MATCHISON
6 Trial Attorney, Tax Division
7 U.S. Department of Justice
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